Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

In the Matter of	)	
	)	
Verilink Corporation's Petition for Rulemaking to Amend the Commission's Part 68 Rules to Authorize Regulated Carriers to Provide Certain Line Build Out Functionality as a Part of Regulated Network Equipment on Customer Premises	)	RM-8158

COMMENTS OF THE NYNEX TELEPHONE COMPANIES

These comments are submitted on behalf of the NYNEX Telephone Companies, New England Telephone and Telegraph Company and New York Telephone Company (respectively "NET" and "NYT"; collectively the "NTCs"), in support of the petition for rulemaking (the "Petition") filed by Verilink Corporation ("Verilink") in the above-entitled proceeding.

In a Memorandum Opinion and Order released on June 6, 1991, the Federal Communications Commission (the "Commission") stated its willingness to consider a rulemaking proceeding to revise Part 68 of its rules and regulations to reflect an American National Standards Institute ("ANSI") standard for a DS1 metallic interface. Such a revision would permit line build out functionality ("LBO") to be provided in the transmission path of DS1 services as part of regulated network interface equipment

located on customer premises.[1] The Commission went on to list eight concerns that, in its view, should be addressed in any subsequently-filed petition for rulemaking on these issues.[2]

Verilink's Petition addresses each of the concerns identified by the Commission, and provides a compelling case in support of Verilink's proposal to revise Part 68 as described above.

Carrier provision of LBO on the network side of the network interface for DS1 service clearly serves the public interest by offering increased efficiencies to customers. At present, in order to implement DS1 service, NTC technicians temporarily install a portable Channel Service Unit ("CSU") to establish the integrity of the circuit. Upon completion of testing, that CSU is removed and the customer is advised of the LBO settings that will permit the customer to attach a customer-provided CSU or equivalent equipment to the verified line at some future date. This approach leaves the responsibility for level coordination with the customer. As a result, the NTCs -- and, indeed, the customers -- must often contend with false trouble signals, substantial "down-time", and situations that could jeopardize the performance of all DS1 circuits in a particular central office cable.

---

1 BellSouth's Petition for Declaratory Ruling or, Alternatively, Request for Limited Waiver of the CPE Rules to Provide Line Build Out (LBO) Functionality as a Component of Regulated Network Interface Connectors on Customer Premises, Memorandum Opinion and Order, released June 6, 1991, 6 FCC Rcd 3336 (the "BellSouth Order"), ¶ 28.

2 BellSouth Order, ¶ 30.

It would be more efficient to permit any necessary signal coordination to be provided as part of the regulated network equipment. Customers would no longer be required to determine the correct signal power output setting, and the potential for network harm through the introduction of excessive power would be greatly diminished.

The rulemaking requested by Verilink would permit implementation of ANSI standard T1.403 for the DS1 metallic interface. Developed under the auspices of the Exchange Carriers Standards Association and adopted by ANSI on February 22, 1989, the standard has received overwhelming support from a broad cross-section of communications industry participants including local carriers, interexchange carriers, Customer Premises Equipment ("CPE") manufacturers, equipment vendors, and users of network services. The Commission itself has recognized the importance of industry standards bodies in providing expertise and a forum for the evolution of the network and Commission rules.

The ANSI standard establishes a standard dry interface for services transported over metallic facilities. The standard facilitates the connection of the customer's digital CPE to the network and eliminates the need for the often complex and time consuming "joint engineering" that occurs today. Since the standard is not technology-dependent, it will enable CPE manufacturers to meet their customers' needs in a more expeditious manner, thus promoting the competitive provision of CPE.

For these reasons, the NTCs support Verilink's Petition and request that the Commission institute a rulemaking proceeding

to give interested parties an opportunity to comment on changes to Part 68 that will authorize carrier provision of LBO as part of the regulated DS1 transmission path. In the alternative, the Commission should consider use of the Negotiated Rulemaking Process through establishment of an Advisory Committee to negotiate the proposed rule changes.

Respectfully submitted,

New England Telephone and
Telegraph Company
and
New York Telephone Company

By _____
Patrick A. Lee
Deborah Haraldson

120 Bloomingdale Road
White Plains, NY 10605
(914) 644-5247

Their Attorneys

Dated: February 8, 1993

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing COMMENTS OF THE NYNEX TELEPHONE COMPANIES was served on the party listed below, this 8th day of February, 1993, by first class United States mail, postage prepaid.

Elaine Fennessy

Elaine Fennessy

William Buckley
Vice President, Technology Development
Verilink Corporation
145 Baytech Drive
San Jose, California 95134